

Part C State Annual Performance Report (APR) for FFY 2011**Overview of the Annual Performance Report Development:**

Same description as included in Indicator #1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8C: Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

C. Transition conference, if child potentially eligible for Part B.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

Percent = [(# of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties not more than nine months prior to the toddler's third birthday for toddlers potentially eligible for Part B) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
FFY 2010	100%

Actual Target Data for FFY 2011

77%

Method used to collect data and the procedures used to collect these data: Transition data were gathered through self-report data from 14 Early Intervention Programs (EIPs) of all child files (children who would shortly reach the age of three) with Individualized Family Service Plan (IFSP) between April 1, 2010 and June 30, 2010. In addition, transition data was gathered through self report from three EIPs who were required to submit a self report prior to their on-site review. Data for these three EIPs was from all child files with IFSPs written during January 1, 2012 to March 30, 2012. All findings of noncompliance based on verified data from self reports were made in FFY 2011.

Children Exiting Part C who Received Timely Transition Planning (Transition Conference):

a. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred	157
b. Number of children exiting Part C who were potentially eligible for Part B	203
Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday (Transition Conference) (Percent = [(a) divided by (b)] times 100)	77%

Accounting for untimely transition conferences:

- Seventy-seven percent (157/203) of children exiting Part C and potentially eligible for Part B had a timely transition conference
 - One of the 157 files reviewed was not timely due to documented exceptional family circumstances. The calculation for timely transition conferences includes the one instance in both the numerator and the denominator.
- Twenty-three percent (46/203) of children exiting Part C and potentially eligible for Part B did not have a timely transition conference
- Three of the fourteen EIPs who submitted self-report data, which was subsequently verified by the State, met compliance of 100 percent (11/11),
- The remaining eleven EIPs did not ensure all children and their families had timely transition conferences:

Program	Files Complaint	Files Reviewed	Total Percentage
1	3	4	75%
2	7	8	86%
3	2	5	40%
4	7	8	88%
5	7	9	78%
6	9	10	90%
7	34	53	64%
8	54	65	83%
9	8	10	80%
10	8	11	72%
11	7	9	78%

- Of the 46 instances of untimely transition conferences, all children who were still in the jurisdiction of the early intervention program did have a transition conference, although late
- Eight findings of noncompliance were made during FFY 2011; action taken to ensure full correction and correction of these findings will be reported on in the FFY 2012 APR.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2011:

The state did not meet its target of 100 percent for FFY 2011 and experienced slippage from FFY 2010 data at 82 percent. Analysis of data by the AzEIP Service providing agency and then by their local early intervention programs (EIP) identified:

Service Providing Agency	Total	Total	% Compliant
Arizona State Schools for the Deaf and the Blind (1 EIP)	3	4	75%
DES/Division of Developmental Disabilities (5EIPs)	111	148	75%
DES/Arizona Early Intervention Program (8 EIPs)	43	51	83%
Total (14 EIPs)	157	203	77%

Early Intervention Programs with Transition data 84 percent or below were selected for site visits. DES/AzEIP staff and, TAMS conducted a root cause analysis, an identified improvement activity, with the EIP staff using the Contributing Factors document. Information was then used to develop a Corrective Action Plan, addressing factors identified through the root cause analysis process. Programs with data between 84-94 percent were required to complete the Contributing Factors document, develop activities/strategies to address the factors identified and submit subsequent data to verify correction.

Policies and Procedures

- Service coordinators consistently reported understanding transition timelines. However service coordinators struggle with not understanding their role and responsibility to schedule and facilitate transition conferences within the required timelines, regardless of the school districts limited availability to participate.

Data

- Programs are not using data to institute and develop procedures to ensure timelines are met.
 - a. Programs are not utilizing resources available in the database to run reports to identify children who are approaching transition
 - b. Programs are not tracking children to ensure transition activities are completed on time.

Supervision

Supervisors are not consistently completing internal reviews to monitor their program data (re: transition) and their staff compliance with transition policy and timelines.

- Supervisors are not assessing data to identify the root cause and implement procedures to correct noncompliance and ensure ongoing monitoring of data,
- Service coordinators reported not knowing the purpose and process for utilizing the AzEIP/ADE Alert System when having difficulty arranging timely transition conferences with the school districts

- Service coordinators who knew of the AzEIP/ADE Alert expressed hesitancy about the use of the System as they did not view it as a relationship building opportunity but rather saw it as “telling on the school district.”

EIPs were required to develop internal tracking procedures to ensure transition conferences were scheduled for each child within the required timelines, unless the parent declined a conference

Supervisors were required to develop procedures for reviewing files to ensure service coordinators were scheduling and facilitating the transition conferences within the required timelines.

The AzEIP Technical Assistance Monitoring Specialist (TAMS) and the Arizona Department of Education (ADE) representative provided targeted technical assistance to schools districts and EIPs who were experiencing challenges in meeting required timelines. The purpose of the meetings were to assist the local Part C and Part B programs in building relationships and developing working procedures to ensure both programs had a shared understanding of the roles, responsibilities and timelines for transition conferences for children nearing the age of three and potentially eligible for Part B.

The AzEIP TAMS provided targeted technical assistance to the EIPS through the development of corrective actions, regular status check to monitor the EIPs progress on their corrective action plan. The TAMS provided support to EIP supervisors with developing training strategies and tools for supervisors to use to build program capacity for providing ongoing and/or as needed training to staff.

The state continued work on development of I-TEAMS, a web-based application that includes a child's records. I-TEAMS will be available in the spring of 2013. When in use, I-TEAMS will send alerts to the service coordinator when the child is nearing transition to ensure the transition conference is held within the required timelines. This feature will assist the service coordinator in tracking each child's timelines, one of the contributing factors to the identified noncompliance. Supervisors and administrators will be able to run the reports as a preventative activity in ensuring the transition conferences are held timely, another activity that is currently not occurring on a regular, consistent basis.

Correction of FFY 2010 Findings of Noncompliance (if State reported less than 100 percent compliance):

Level of compliance (actual target data) State reported for FFY 2010 for this indicator: 82 percent.

1. Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010, through June 30, 2011)	5
2. Number of FFY 2010 findings the State verified as timely corrected (corrected within one (1) year from the date of notification to the EIS program of the finding)	3
3. Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus two (2)]	2

Correction of FFY 2010 Findings of Noncompliance BEYOND One Year (if State reported less than 100 percent compliance):

Level of compliance (actual target data) State reported for FFY 2010 for this indicator: 82 percent

4. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	2
5. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	2

6. Number of FFY 1010 findings not verified as corrected [(4) minus (5)]	0
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Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2010:

Demonstrating Correction as outlined in 09-02 Memo**1. Accounting for All Instances of Noncompliance:**

- The State accounted for all instances of noncompliance as identified through on site monitoring of EIPs based on a five year cycle.
 - Noncompliance Occurred in five EIPs as follows:
 - Program 1 - 1/3 files 33%
 - Program 2 - 31/35 file 79%
 - Program 3 - 52/66 files 79%
 - Program 4 - 81/108 files 81%
 - Program 5 - 11/15 files 73%
- Through data verification and subsequent root cause analysis process, including interview with supervisors and their service coordinators and families, the State was able to identify the following contributing factors to the noncompliance:
 - **Policies and Procedures:** The service coordinators were not implementing the AzEIP policies and procedures that they conduct the transition conference within the required timeframe even if the school district was unable to attend. Documentation in many of the child's records included early contact with the school district and subsequent documentation that the school district was unable to attend on or before the child's age of two years nine months. As a result, the conferences were held at the time the school district could attend. The Corrective Action Plans for each of these EIPs included the requirement to develop local procedures with their school districts and to follow the AzEIP/ADE Alert process when they are unable to resolve the issues locally. Many of the EIPs also instituted regularly scheduled meetings with the school districts to review procedures and discuss any newly identified barriers and opportunities for improvements.

In addition, there were many service coordinators that did not have internal tracking procedures which impacted their ability to ensure each child had a transition conference between 2.6 years-2.9.
 - **Supervision:** While DES/AzEIP and ADE had recently held joint seminars for early intervention professionals, local school districts and Early Head Start/Head Start on the revised Transition IGA requirements, it was evident through discussions with the service coordinators that they needed ongoing support/supervision in ensuring they understood and implemented the requirements by communicating early with the

school districts to ensure conferences were held within the timeframe, even if the school district representative was unable to attend.

2. To Address the Noncompliance, the State Required the EIP to:

- Develop procedures to ensure service coordinators scheduled and held the transition conference during the required timeframe, even if the school was unable to attend.
- Service coordinators were advised of the Alert system and encouraged to send in Alerts when they were unable to schedule a transition conference that included the school district representative.
- Submit subsequent documentation of child's records to ensure the service coordinators were correctly implementing the requirements.

3. Verification of Correction of FFY 2009 Findings of Noncompliance (either timely or subsequent):

- Prong 1: To verify correction of child-specific noncompliance, the state required the EIP to send the PEA Notification/Referral to the school district, although late, as long as the child was still in the jurisdiction of the EIP. AzEIP Technical Assistance and Monitoring Specialists verified correction through review of documentation.
- Prong 2: To verify the program was correctly implementing the transition conference requirements (i.e., achieved 100 percent compliance) in 34C.F.R. § 303.148(b)(2)(i), a subsequent on-site review of files, for children nearing the age of three was conducted by the AzEIP TAMS to ensure the files included documentation of timely transition conferences.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
<p>Because the state reported less than 100 percent compliance for FFY 2010, the state must report on the status of correction of noncompliance reflected in the data the state reported for this indicator. When reporting on the correction of noncompliance, the state must report, in its FFY 2011 APR, that it has verified that each EIS program with noncompliance identified in FFY 2010 for this indicator: (1) is correctly implementing 34 CFR § 303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a state data system; and (2) has conducted a transition conference, although late, for any child potentially eligible for Part B whose transition conference was not timely, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2011 APR, the state must describe the specific actions that were taken to verify the</p>	<p>The state reported on the status of correction of noncompliance in the data the state reported for this indicator. The state reported that it has verified that each EIP program with noncompliance identified in FFY 2010 for this indicator:</p> <p>(1) is correctly implementing 34 CFR § 303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100 percent compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and</p> <p>(2) has conducted a transition conference, although late, for any child potentially eligible for Part B whose transition conference was not timely, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2011 APR, the state must describe the specific actions that were taken to verify the correction.</p>

APR Template – Part C (4)

Arizona
State

correction.	
If the state does not report 100 percent compliance in the FFY 2010 APR, the state must review its improvement activities and revise them, if necessary to ensure compliance.	The state reviewed its improvement activities and determined no revisions were needed.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011 (if applicable):